

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

BOAT PEOPLE S.O.S., INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No: 1:16-cv-00455-GBL-JFA
	:	
PUBLIC HEALTH MANAGEMENT	:	
CORPORATION, et al.	:	
	:	
	:	
Defendants.	:	
	:	
_____ /	:	

DEFENDANT PUBLIC HEALTH MANAGEMENT CORPORATION’S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION UNDER RULE 12(b)(1), LACK OF PERSONAL JURISDICTION UNDER RULE 12(b)(2), AND FAILURE TO STATE A CLAIM UNDER RULE 12(b)(6)

Defendant, Public Health Management Corporation, by counsel, in accordance with the Federal Rules of Civil Procedure, hereby submits its Motion to Dismiss for Lack of Subject Matter Jurisdiction Under Rule 12(b)(1), Lack of Personal Jurisdiction Under Rule 12(b)(2), and Failure to State a Claim Under Rule 12(b)(6). An accompanying Memorandum in Support is filed herewith for the Court’s consideration.

Dated: June 7, 2016	Respectfully submitted, PUBLIC HEALTH MANAGEMENT CORPORATION By Counsel
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/s/ John D. McGavin

John D. McGavin (VSB No. 21794)
Andrew R. Alder (VSB No. 86116)
BANCROFT, McGAVIN, HORVATH & JUDKINS, P.C.
9990 Fairfax Boulevard, Suite 400
Fairfax, Virginia 22030
Telephone: (703) 385-1000
Facsimile: (703) 385-1555
E-mail: jmcgavin@bmhjlaw.com
aalder@bmhjlaw.com
Counsel for Defendant Public Health Management Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June 2016, a true and correct copy of the foregoing will be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record:

/s/ John D. McGavin

John D. McGavin (VSB No. 21794)
BANCROFT, McGAVIN, HORVATH &
JUDKINS, P.C.
9990 Fairfax Boulevard, Suite 400
Fairfax, Virginia 22030
Telephone: (703) 385-1000
Facsimile: (703) 385-1555
E-mail: jmcgavin@bmhjlaw.com
*Counsel for Defendant Public Health
Management Corporation*